

**EXHIBIT A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

AMBAC ASSURANCE CORPORATION,

Movants,

-v-

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO; and THE PUERTO RICO FISCAL  
AGENCY AND FINANCIAL ADVISORY  
AUTHORITY,

Respondents.

Case No. 17-BK-3283-LTS

**Re: ECF Nos. 9022, 9023**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO; and THE PUERTO RICO FISCAL  
AGENCY AND FINANCIAL ADVISORY  
AUTHORITY,

Cross-Movants,

-v-

AMBAC ASSURANCE CORPORATION,

Cross-Respondent.

**[PROPOSED] ORDER GRANTING URGENT MOTION OF FINANCIAL OVERSIGHT  
AND MANAGEMENT BOARD FOR PUERTO RICO AND PUERTO RICO FISCAL  
AGENCY AND FINANCIAL ADVISORY AUTHORITY TO STRIKE (A) AMBAC  
ASSURANCE CORPORATION’S MOTION FOR ENTRY OF ORDER AUTHORIZING  
DISCOVERY UNDER BANKRUPTCY RULE 2004 CONCERNING  
COMMONWEALTH ASSETS [ECF NO. 9022] AND (B) AMBAC ASSURANCE  
CORPORATION’S MOTION FOR ENTRY OF ORDER AUTHORIZING DISCOVERY  
UNDER BANKRUPTCY RULE 2004 CONCERNING COMMONWEALTH CASH  
RESTRICTION ANALYSIS [ECF NO. 9023] AND FOR SANCTIONS**

Upon consideration of the *Urgent Motion of Financial Oversight and Management Board for Puerto Rico and Puerto Rico Fiscal Agency and Financial Advisory Authority to Strike (a) Ambac Assurance Corporation’s Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Commonwealth Assets [ECF No. 9022] and (b) Ambac Assurance Corporation’s Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Commonwealth Cash Restriction Analysis [ECF No. 9023] and Sanctions*, (the “Urgent Motion”);<sup>2</sup> and it appearing that (i) the Court has subject matter jurisdiction over the Urgent Motion pursuant to 48 U.S.C. § 2166(a); (ii) venue of this proceeding and the Urgent

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Urgent Motion.

Motion is proper under 48 U.S.C. § 2167(a); (iii) notice of the Urgent Motion was adequate and proper under the circumstances and that no further or other notice need be given; and after due deliberation and sufficient cause appearing therefor, It is hereby **ORDERED**:

1. The Urgent Motion is **GRANTED** as set forth herein.
2. The motions entitled (a) *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Commonwealth Assets* [ECF No. 9022] and (b) *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Commonwealth Cash Restriction Analysis* [ECF No. 9023], are stricken;
3. Ambac Assurance Corporation shall pay the Cross-Movants each of their costs and expenses, including attorneys' fees, incurred by each of them in responding to the aforementioned motions;
4. The Court shall retain subject matter jurisdiction to hear and determine all matters arising from implementation of this Order.

Dated: November \_\_, 2019

SO ORDERED:

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Honorable Judith G. Dein  
United States Magistrate Judge